

1 Name: Russell J Terry
2 Address: 1401 21ST ST STE R
3 SACRAMENTO, CA 95811
4 Phone number: 720-603-1872
5 Plaintiff in Pro Per

FILED CLERK, U.S. DISTRICT COURT
4/2/24
CENTRAL DISTRICT OF CALIFORNIA BY: <u>eee</u> DEPUTY

9
10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**

12 Russell J Terry,

13 Plaintiff,

14 vs.

15 Apex Systems, LLC, AT&T, DirecTV,
16 LLC, Mehak Delawalla, Kim Chu, John
17 Goulding, Oscar Montoya, Ian
18 Hafkenschiel, Daniel Salt
19 Defendants.

Case No.: CV23-7707-FMO(JCx)

DISCOVERY MATTER

**PLAINTIFF'S NOTICE OF
MOTION AND MOTION TO
COMPEL DEFENDANT APEX
SYSTEMS LLC TO PRODUCE SET
1 AND SET 2 DOCUMENTS AND
RESPOND TO SET 1 AND SET 2
INTERROGATORIES, AND
OVERRULE OBJECTIONS**

20 DATE: April 30, 2024

21 TIME: 9:30 a.m.

22 JUDGE: Hon. Jacqueline Chooljian

23 CTRM: 750

24 Discovery Cutoff: None Set

25 Pre-Trial Conference: None Set

26 Trail Date: None Set

1 TO THE HONORABLE COURT AND ALL PARTIES AND THEIR
2 ATTORNEYS OF RECORD:

3
4 PLEASE TAKE NOTICE that on April 30, 2024, at 9:30 AM, or as
5 soon thereafter as the matter may be heard, in the courtroom of the
6 Honorable Jacqueline Chooljian, court room 750, Plaintiff Russell Terry,
7 proceeding pro se, will and hereby does move the court for an order
8 compelling Defendant Apex Systems, LLC to Produce set 1 and set 2
9 Documents as required by Federal Rule of Civil Procedure 34(b)(2) and
10 Respond to set 1 and set 2 Interrogatories as required by FRCP 33(b).
11 Additionally, Plaintiff requests that the court overrule any objections raised
12 by Defendant Apex Systems, LLC in response to the discovery requests.
13

14 This Motion is supported by the Memorandum of Points and
15 Authorities and Personal Declaration of Russell Terry.
16

17 This Motion is made pursuant to Local Rule 37-2.4(c). The opposing
18 counsel failed to sign and return the joint stipulation to counsel for the
19 moving party.
20

21 Dated: April 2, 2024

Russell J Terry

22 /s/ Russell Terry

23 Russell J Terry

24 1401 21ST ST STE R

25 SACRAMENTO, CA 95811

26 R2dat@yahoo.com

27 720-603-1872
28

1
2
3
4
5
6 CERTIFICATE OF SERVICE
7
8

9 I hereby certify that on April 2, 2024, I electronically filed the foregoing
10 document with the Clerk of the Court using the EDSS. I also certify that the
11 forgoing document is being served this day to counsel of record Wendy Sugg
12 at Sugg Law via email transmission to wendy@sugglaw.com.

13
14 Date: April 2, 2024

15
16 /s/ Russell Terry

17 Russell Terry
18 1401 21ST ST STE R
19 SACRAMENTO, CA 95811
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